

SIMON GREENSTONE PANATIER, PC  
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*Counsel for Various Mesothelioma Talc Claimants*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY**

In re:	Chapter 11
LTL MANAGEMENT LLC,	Case No. 23-12825 (MBK)
Debtor.	Judge: Michael B. Kaplan

**AFFIDAVIT OF JEFFREY B. SIMON, ESQ.**

STATE OF TEXAS )  
COUNTY OF )

I, JEFFREY SIMON being of full age and sworn according to law, depose and say:

1. I am an attorney admitted to the practice of law in the States of California, New York, and Texas.

2. I am an attorney with the firm of Simon Greenstone Panatier, PC. I am a resident of the State of Texas and my office address is 1201 Elm Street, Ste 3400, Dallas, Texas 75270. I submit this affidavit in support of my application for admission pro hac vice in this matter as an Interested Party representing Various Talc Claimants.

3. I am a member in good standing of three State Bars, having been admitted in the following states with corresponding dates of admission: New York (Bar No. 4301719; February 2005); California (Bar No. 262422; February 2009); and Texas (Bar No. 00788420; November

1993). I submit the Certificates of Good Standing, attached to this Affidavit as **Exhibit A**. All are dated within thirty (30) days of this Affidavit, as required by Local Civil Rule 1.3(a).

4. I received my juris doctorate from University of Texas in 1993. Since being admitted, I have been engaged in and litigated and tried cases in state courts in the United States, including the New York Supreme Court Appellate Division Third Judicial DPT.

5. I have never been held in contempt of court. I have never been censured, suspended, disbarred or denied admission or readmission by any trial or bankruptcy court.

6. I am associated in the within matter with Leah C. Kagan, an attorney admitted to the bar of the courts of the State of New Jersey and in the United States District Court of New Jersey.

7. I have obtained a copy of the Local Bankruptcy Rules and am generally familiar with such rules. I will comply with all court and ethical rules governing the practice of law before this Court.

8. I further agree to pay all fees to the Clerk of the United States Bankruptcy Court for the District of New Jersey and the Lawyer's Fund for Client Protection as provided in the Local Rules of the United States District Court for the District of New Jersey.

9. I will faithfully adhere to all rules applicable to my conduct in connection with any activities in this Court.

Dated: New York, New York  
April 18, 2023

Respectfully submitted,

/s/ Jeffrey Simon \_\_\_\_\_  
Jeffrey Simon, Esq.  
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